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Attorneys for MIGUEL VEGA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE THOMAS J. WHELAN)

UNITED STATES OF AMERICA,	)	Criminal No. 08-cr-00374-W
	)	
Plaintiff,	)	Date: March 3, 2008
	)	Time: 2:00 p.m.
v.	)	
	)	NOTICE OF MOTIONS AND MOTIONS TO:
MIGUEL VEGA,	)	1) COMPEL DISCOVERY AND PRESERVE
	)	EVIDENCE; AND
Defendant.	)	2) GRANT LEAVE TO FILE FURTHER
	)	MOTIONS
_____	)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND  
ASSIGNED ASSISTANT UNITED STATES ATTORNEY:

**PLEASE TAKE NOTICE** that on March 3, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, the accused, MIGUEL VEGA, by and through his attorneys, Timothy R. Garrison, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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**MOTIONS**

1 MIGUEL VEGA, the accused in this case, by and through his attorneys, Timothy R. Garrison,  
2 and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United  
3 States Constitution, Federal Rules of Criminal Procedure and all other applicable statutes, case law and local  
4 rules, hereby moves this court for an order:

- 5 1) to compel discovery and preserve evidence;  
6 2) to grant leave to file further motions.

7 These motions are based upon the instant motions and notice of motions, the attached  
8 statement of facts and memorandum of points and authorities, and any and all other materials that may come  
9 to this Court's attention at the time of the hearing on these motions.

10 Respectfully submitted,

11  
12 Dated: February 22, 2008  
13 /s/ Timothy R. Garrison  
14 **TIMOTHY R. GARRISON**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Vega  
[timothy\\_garrison@fd.org](mailto:timothy_garrison@fd.org)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MIGUEL VEGA,  
Defendant.

Case No. 08cr0374-W

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading, is true and accurate to the best of his information and belief, and that a copy of the foregoing has been electronically served this day upon:

**U S Attorney CR**  
Efile.dkt.gc2@usdoj.gov

Mailed to:  
Miguel Vega  
Defendant

Dated: February 22, 2008

/s/ Timothy R. Garrison  
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